

From: Norman Hargreaves [mailto:nhargreaves@terexconway.com]
Sent: Wednesday, June 02, 2004 9:44 AM
To: connell.noah@dol.gov
Subject: Insulated Links

Mr. Connell,

I understand that the CDAC committee will be discussing the Insulated Link issue at the current meeting. It should be recognized that the Link is only represented to protect a person touching the load. In many cases the people who are injured are close to or touching the crane. The Link gives no protection to those people. Before making a final decision I would suggest that NIOSH, your research department, study the human factors aspect of this. My concern is that with a Link installed operators will work closer to the lines than they would otherwise would. If that were found to be the case there would be more potential for contact and injuries to workers around the crane as some of these workers may not be aware of the potential for injury. If you decide to require these devices I would suggest you incorporate the dielectric testing requirements for protective equipment as required by OSHA 1910.137 and 1926.951.

Norman C Hargreaves
Director of Product Safety
Terex Corporation